

**STATEMENT OF
COMMISSIONER GEOFFREY STARKS,
DISSENTING**

Re: *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42; *Telecommunications Carriers Eligible for Universal Service Support*, WC Docket No. 09-197; *Connect America Fund*, WC Docket No. 10-90, Order

In 2016, the Commission adopted minimum service standards for Lifeline-supported services.¹ It turns out the expectations for the Lifeline marketplace are not the reality we have today, and this is why a petition was filed earlier this year to pause the changes set to go into effect on December 1, 2019.²

In fact, the Order before us today acknowledges that there is a misalignment between current marketplace dynamics and the Commission's efforts to set standards for the program, including the large increase in the required data allotment. The Bureau is working on a report that will give us a better understanding of the Lifeline market. Until that report is completed and analyzed, it is my belief that we should refrain from making any additional changes until we have the necessary data to make informed decisions, rather than rushing to impose standards that may have far-reaching ramifications on the program.

Additionally, it is important to note that the record reflects overwhelming support for pausing the voice-only phase down.³ The fact of the matter is that the voice-only phase down will likely have a real impact on the nearly one million people who subscribe to these services. I fear that our poorest Americans now risk losing their link to emergency services, doctors, employers, and family.

For all of these reasons, I dissent.

¹ *Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42 et al., Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd 3962 (2016).

² Joint Petition to Pause Implementation of December 2019 Lifeline Minimum Service Standards Pending Forthcoming Marketplace Study, WC Docket No. 11-42 et al. (filed June 27, 2019).

³ See, e.g., Letter from John J. Heitmann, Counsel to the National Lifeline Association and Q Link Wireless LLC, to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 11-42 et al. (filed Nov. 15, 2019); Letter from Phillip Berenbroick, Policy Director, Public Knowledge, to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 11-42 et al. (filed Nov. 15, 2019); Letter from Alex Nogales, President & CEO, National Hispanic Media Coalition et al., to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 11-42 et al. (filed Nov. 13, 2019); Letter from Leo Fitzpatrick, Policy Counsel, Free Press, to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 11-42 et al. (filed Nov. 12, 2019); and Letter from Matthew Gerst, Vice President, Regulatory Affairs, CTIA, to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 11-42 et al. (filed Nov. 5, 2019).